

**STEPHEN B. MERCER, ESQ., P.C.**

ATTORNEY AT LAW

11 North Washington Street, Suite 520  
Rockville, Maryland 20850  
Voice (301) 637-5775 • Fax (301) 838-0322  
[www.SBMlaw.com](http://www.SBMlaw.com)

STEPHEN B. MERCER, ESQ.\*

[sbm@sbmlaw.com](mailto:sbm@sbmlaw.com)

October 26, 2009

Hon. Deborah K. Chasanow  
Judge, United States District Court  
for the District of Maryland  
6500 Cherrywood Lane  
Greenbelt, Maryland 20770

RE: *Wilmer Deras, et al. v. Verizon, Inc. et al.*, 8:09-cv-00791-DKC

Dear Judge Chasanow:

I represent plaintiffs in the above action alleging violations of federal and state wage and hour law in connection with their work installing fiber optic cables and related tasks on behalf of the various named defendants. This letter responds to the Court's request to me for a status report no later than October 26, 2009.

The action was originally filed in state court on December 18, 2008, and removed to this court on March 30, 2009, by defendant Cablecom, LLC, with the consent of the then served defendants. Defendant Cablecom LLC has filed an answer to the complaint, but the defendants Utilities Maldonado, Inc., Armando Moreno Maldonado, and Marissa Rodriguez Rivera, have not. Defendant Verizon, Inc. remains unserved because it was unclear which of the various (and numerous) corporate entities that include the name "Verizon" was the correct party. It now appears that Verizon Maryland, Inc. may be the current and active entity to be named in an amended complaint, if necessary.

Pending the issuance of a scheduling order, I agreed to informally provide counsel for Cablecom LLC with discovery related to plaintiffs' claims. I have served Cablecom LLC's counsel today with 355 pages of discovery and an electronic excel spreadsheet that summarizes the wage and hour information of the various plaintiffs identified in it. I anticipate that we will engage in further discussions on behalf of our respective clients to evaluate a possible early resolution of the claims in this matter before the formal discovery process begins.

Sincerely,

STEPHEN B. MERCER, ESQ., P.C.

/s/

BY: Stephen B. Mercer, Esq.

Cc: John S. Bolesta (counsel for Cablecom LLC)

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\* Licensed in MD & DC